JUN 18 2013

## COMMONWEALTH OF KENTUCKY PUBLIC SERVICE BEFORE THE PUBLIC SERVICE COMMISSION OF KENTUCK MMISSION

In the Matter of:	)	
Joint Application of Kenergy Corp. And Big Rivers Electric Corporation For Approval Of Contracts And For A	) ) )	case no. 2013- <u>22</u> 1
Declaratory Order	)	

## MOTION TO INTERVENE OF CENTURY ALUMINUM OF KENTUCKY GENERAL PARTNERSHIP

Pursuant to 807 KAR 5:001 Section 4(11), Century Aluminum of Kentucky General Partnership ("Century" or the "Company") requests that it be granted full party status in the above-captioned proceeding. In support thereof, Century states the following:

- 1. Century owns and operates an aluminum reduction plant located in Hawesville, Kentucky ("Hawesville Smelter"), and purchases electric energy and related services from Kenergy Corp. pursuant to a Retail Electric Service Agreement dated July 1, 2009. The address for the Hawesville Smelter is 1627 State Route 3543, Hawesville, KY 42348.
- 2. The Hawesville Smelter consumes substantial quantities of electricity in its processes, making Century one of Kentucky's largest electricity consumers. The matters being decided by the Kentucky Public Service Commission ("Commission") in this proceeding will have a significant impact on the rates paid by Century for electricity. Therefore, Century has a special interest in this proceeding that cannot be adequately represented by any other party.

- 3. Century hereby moves for leave to intervene and to be heard on all issues before the Commission. Granting full intervention to Century will allow Century to present issues or develop facts that will assist the Commission in fully considering this matter without unduly complicating or disrupting this proceeding.
- 4. If Century is granted full party status in this proceeding, service of all documents required to be served on all parties should be made on the following persons:<sup>1</sup>

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WHEREFORE, Century respectfully requests that the Commission grant its Motion to Intervene in the above-referenced proceeding.

<sup>&</sup>lt;sup>1</sup> Concurrent with the filing of this Motion to Intervene, Century is filing a separate Motion for Admission *Pro Hac Vice* for Robert A. Weishaar, Jr.

Respectfully submitted,

Bowles Rice LLP

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Counsel to Century Aluminum of Kentucky General

Partnership

Dated: June 12, 2013